

ALVERSON TAYLOR & SANDERS  
LEANN SANDERS, ESQ.  
Nevada Bar No.: 000390  
COURTNEY CHRISTOPHER, ESQ.  
Nevada Bar No.: 012717  
6605 Grand Montecito Parkway, Ste. 200  
Las Vegas, NV 89149  
(702) 384-7000  
[efile@alversontaylor.com](mailto:efile@alversontaylor.com)  
Attorneys for Defendant KEN B. PRIVETT

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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DIAMOND RESORTS U.S. COLLECTION  
DEVELOPMENT, LLC, a Delaware limited  
liability company,

Plaintiffs,

vs.

REED HEIN & ASSOCIATES, LLC, d/b/a  
TIMESHARE EXIT TEAM, a Washington  
limited liability company, BRANDON  
REED, an individual and citizen of the State  
of Washington, TREVOR HEIN, an  
individual and citizen of Canada; THOMAS  
PARENTAU, an individual and citizen of the  
State of Washington; HAPPY HOUR MEDIA  
GROUP, LLC, a Washington limited liability  
company; MITCHELL R. SUSSMAN, ESQ.,  
d/b/a THE LAW OFFICES OF MITCHELL  
REED SUSSMAN & ASSOCIATES, an  
individual and citizen of the State of  
California; SCHROETER, GOLDMARK &  
BENDER, P.S. a Washington professional  
services corporation; and KEN B. PRIVETT,  
ESQ., a citizen of the State of Oklahoma,

Defendants.

Case No.: 2:17-03007-APG-VCF

**AMENDED STIPULATION AND  
ORDER REGARDING DEFENDANT  
REED HEIN & ASSOCIATES, LLC, d/b/a  
TIMESHARE EXIT TEAM'S NON-  
ASSERTION OF PRIVILEGE**

ALVERSON TAYLOR & SANDERS  
LAWYERS  
6605 GRAND MONTECITO PKWY STE 200  
LAS VEGAS, NV 89149  
(702) 384-7000

**AMENDED STIPULATION AND ORDER REGARDING DEFENDANT REED HEIN & ASSOCIATES, LLC, d/b/a TIMESHARE EXIT TEAM'S NON-ASSERTION OF PRIVILEGE**

COMES NOW, Defendant KEN B. PRIVETT, ESQ. (hereinafter "Privett"), by and through his attorneys of record, ALVERSON TAYLOR & SANDERS, and Defendant REED HEIN & ASSOCIATES, LLC, d/b/a TIMESHARE EXIT TEAM ("TET"), by and through their attorneys of record, GORDON REES SCULLY MANSUKHANI LLP, and LAW OFFICES OF PANDA KROLL, hereby stipulate and agree as follows:

A. On Tuesday, May 26, 2020, TET and Privett filed a proposed Stipulation and Order for Defendant Reed Hein & Associates, LLC dba Timeshare Exit Team to Waive the Attorney-Client Privilege. Said proposed Stipulation and Order is pending before the Court.

B. The instant Amended Stipulation and Order Regarding Defendant Reed Hein & Associates, LLC dba Timeshare Exit Team's Non-Assertion of Privilege shall amend and replace the May 26, 2020 proposed Stipulation and Order as stated below.

C. This amendment is not sought for the purpose of delay but to clarify the parties' intent in the prior proposed Stipulation and Order.

TET does not, and will not, assert a claim to attorney-client privilege and the work-product privilege over communications between Privett and TET insofar as the communications relate to Privett's work representing TET customers. Inasmuch as these communications were such that Privett provided legal advice to TET, separate from Privett's work representing TET customers, TET asserts privilege over these communications.

This stipulation does not address any potential privileges that may exist as to Privett and individual TET customers.

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**Diamond Resorts International, et al. v. Reed Hein & Assoc., et al.**

**Case No.: 2:17-03007-APG-VCF**  
**Stipulation and Order For Defendant Reed Hein & Associates, LLC dba Timeshare Exit**  
**Team's Non-Assertion of Privilege**

**IT IS SO STIPULATED.**

Dated this 29<sup>th</sup> day of May, 2020

Dated this 29<sup>th</sup> day of May, 2020

GORDON REES SCULLY MANSUKHANI LLP  
LAW OFFICES OF PANDA KROLL

ALVERSON TAYLOR & SANDERS

/s/ Dione C. Wrenn

/s/ LeAnn Sanders

DAVID T. GLUTH II, ESQ.

LEANN SANDERS, ESQ.

Nevada Bar No.: 010596

Nevada Bar No.: 000390

ROBERT S. LARSEN, ESQ.

COURTNEY CHRISTOPHER, ESQ.

Nevada Bar No.: 007785

Nevada Bar No.: 012717

DIONE C. WRENN, ESQ.

6605 Grand Montecito Parkway, Suite 200

Nevada Bar No.: 013285

Las Vegas, Nevada 89149

GORDON REES SCULLY MANSUKHANI LLP

*Attorneys for Defendant*

300 S. Fourth Street, Suite 1550

KEN B. PRIVETT, ESQ.

Las Vegas, NV 89101

AND

PANDA KROLL, ESQ.

LAW OFFICES OF PANDA KROLL

5999-B Ridgeview Street

Camarillo, CA 93012

*Attorneys for Defendants*

REID HEIN & ASSOCIATES, LLC,

BRANDON REED, THOMAS

PARENTAU, TREVOR HEIN, and HAPPY

HOUR MEDIA GROUP

ALVERSON TAYLOR & SANDERS

LAWYERS

6605 GRAND MONTECITO PKWY STE 200

LAS VEGAS, NV 89149

(702) 384-7000

*Diamond Resorts International, et al. v. Reed Hein & Assoc., et al.*

*Case No.: 2:17-03007-APG-VCF*

*Stipulation and Order For Defendant Reed Hein & Associates, LLC dba Timeshare Exit Team's Non-Assertion of Privilege*

**ORDER**

Pursuant to the stipulation of the appearing parties, and good cause appearing therefore,  
IT IS SO ORDERED.

Dated this 29<sup>th</sup> day of May, 2020.



United States Magistrate Judge

Respectfully submitted by,  
ALVERSON TAYLOR & SANDERS

By /s/ LeAnn Sanders  
LEANN SANDERS, ESQ.  
Nevada Bar No.: 000390  
COURTNEY CHRISTOPHER, ESQ.  
Nevada Bar No.: 012717  
6605 Grand Montecito Parkway, Suite 200  
Las Vegas, Nevada 89149  
*Attorneys for Defendant*  
KEN B. PRIVETT, ESQ.

ECF No. 236 is not approved since the  
AMENDED STIPULATION AND ORDER  
REGARDING DEFENDANT REED HEIN  
& Associates, LLC dba Timeshare Exit  
Team's Non-Assertion of Privilege is the  
operative stipulation.

ALVERSON TAYLOR & SANDERS  
LAWYERS  
6605 GRAND MONTECITO PKWY STE 200  
LAS VEGAS, NV 89149  
(702) 384-7000

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5, I hereby certify that I am an employee of ALVERSON, TAYLOR & SANDERS and that on the 29<sup>th</sup> day of May, 2020, I caused to be served via CM/ECF a true and correct copy of AMENDED STIPULATION AND ORDER REGARDING DEFENDANT REED HEIN & ASSOCIATES, LLC, d/b/a TIMESHARE EXIT TEAM'S NON-ASSERTION OF PRIVILEGE, to the following:

Kimberly Maxson-Rushton, Esq.  
Email: [krushton@cooperlevenson.com](mailto:krushton@cooperlevenson.com)  
Gregory A. Kraemer, Esq.  
Email: [gkraemer@cooperlevenson.com](mailto:gkraemer@cooperlevenson.com)  
COOPER LEVENSON, P.A.  
1835 Village Center Circle  
Las Vegas, NV 89134

Phillip Silvestri, Esq.  
Email: [Phillip.Silvestri@gmlaw.com](mailto:Phillip.Silvestri@gmlaw.com)  
GREENSPOON MARDER, LLP  
3993 Howard Hughes Parkway, Ste. 400  
Las Vegas, NV 89169

Michele E. Durieux-Oquendo, Esq.  
Email: [Michelle.Durieux@gmlaw.com](mailto:Michelle.Durieux@gmlaw.com)  
Richard W. Epstein, Esq.  
Email: [Richard.Epstein@gmlaw.com](mailto:Richard.Epstein@gmlaw.com)  
Jeffrey A. Backman, Esq.  
Email: [Jeffrey.Backman@gmlaw.com](mailto:Jeffrey.Backman@gmlaw.com)  
GREENSPOON MARDER LLP  
200 E. Broward Blvd., Ste. 1800  
Fort Lauderdale, FL 33301-1963

*Attorneys for Plaintiffs*

Joseph A. Liebman, Esq.  
Email: [jliebman@baileykenedy.com](mailto:jliebman@baileykenedy.com)  
BAILEY KENNEDY  
8984 Spanish Ridge Avenue  
Las Vegas, NV 89148-1302

Mitchell Reed Sussman, Esq.  
(Admitted Pro Hac Vice)  
Email: [raventvl@aol.com](mailto:raventvl@aol.com)  
Leslie Benjamin, Esq.  
(Admitted Pro Hac Vice)  
Email: [lesliebenjamin419@gmail.com](mailto:lesliebenjamin419@gmail.com)  
1053 S. Palm Canyon Drive  
Palm Springs, CA 92264

*Attorneys for Defendant*  
**MITCHELL REED SUSSMAN**

Bruce Alan Finck, Esq.  
Email: [bfinck@bentonorr.com](mailto:bfinck@bentonorr.com)  
Kevin M. McCormick, Esq.  
Email: [kmccormick@bentonorr.com](mailto:kmccormick@bentonorr.com)  
BENTON ORR DUVAL & BUCKINGHAM  
39 N. California Street  
Ventura, CA 93001

David T. Gluth II, Esq.  
Email: [dgluth@grsm.com](mailto:dgluth@grsm.com)  
Robert S. Larsen, Esq.  
Email: [rlarsen@grsm.com](mailto:rlarsen@grsm.com)  
GORDON REES SCULLY MANSUKHANI LLP  
300 S. Fourth Street, Suite 1550  
Las Vegas, NV 89101

Panda Kroll, Esq.  
Email: [pkroll@pandakrollesq.com](mailto:pkroll@pandakrollesq.com)  
LAW OFFICES OF PANDA KROLL  
5999-B Ridgeview Street  
Camarillo, CA 93012

*Attorneys for Defendants REID HEIN & ASSOCIATES, LLC, BRANDON REED, THOMAS PARENTAU, TREVOR HEIN, and HAPPY HOUR MEDIA GROUP*

Joseph P. Garin, Esq.  
Email: [jgarin@lipsonnelson.com](mailto:jgarin@lipsonnelson.com)  
Megan H. Hummel Esq.  
Email: [mhummel@lipsonnelson.com](mailto:mhummel@lipsonnelson.com)  
LIPSON NIELSON P.C.  
9900 Covington Cross Drive, Suite 120  
Las Vegas, NV 89144

*Attorneys for Defendant SCHROETER GOLDMARK & BENDER, P.S.*

/s/ Adam Noyce  
An Employee of ALVERSON TAYLOR & SANDERS